

Musi, Merkin, Daubensberger & Clark, LLP

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Dimitri L. Karapelou, Esquire

ATTORNEY FOR DEBTOR

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: KINGDOM EMPOWERMENT INTERNATIONAL MINISTRY D/B/A KINGDOM EMPOWERMENT INTERNATIONAL MINISTRIES <i>Debtor.</i>	Chapter 11 Bankruptcy No.: 24- 14289
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APPLICATION OF DEBTOR TO EMPLOY COUNSEL

1. On November 29, 2024, a Voluntary Petition was filed by the Debtor.
2. The Debtor is a non-profit organization licensed under the laws of the Commonwealth of Pennsylvania. The Debtor is a religious organization that provides educational, artistic and social services.
3. The Debtor's mission is to reposition people through training, equipping and developing transformational leaders to fulfill their given destinies.
4. The Debtor is not sufficiently familiar with its rights and duties as to be able to plan and conduct proceedings without the aid of competent counsel.
5. The Debtor has made careful and diligent inquiry into the qualifications and competence of the law firm of Musi, Merkins, Daubensberger & Clark, LLP and is advised that

Musi, Merkins, Daubenerger & Clark, LLP, by reason of ability, integrity and professional experience, is capable of providing proper legal counsel to the Applicant.

6. Applicant has engaged the services of Musi, Merkins, Daubenerger & Clark, LLP as attorney for the Debtor and has engaged such services as counsel for the Debtor, subject to the approval of the Court.

7. The attached Declaration of Dimitri L. Karapelou, Esquire details payments made by Debtor to Musi, Merkins, Daubenerger & Clark, LLP prior to this bankruptcy.

8. Musi, Merkins, Daubenerger & Clark, LLP is to render the following professional services:

- (a) giving the Debtor legal advice with respect to its duties and powers in this case;
- (b) preparation of all papers and legal documents required to be filed in connection with this bankruptcy proceeding;
- (c) negotiation with all creditors;
- (d) pursuing existing litigation;
- (e) assisting the Debtor in its investigation of the acts, conduct, assets, liabilities and financial condition of the Debtor, the operation of the Debtor's business and the desirability of the continuance of such business, and any other matter relevant to the case or the formation of a plan;
- (f) participating with the Debtor in the formulation of a plan; and
- (g) performing such other legal services as may be required and in the interest of creditors.

8. To the best of the Debtor's knowledge, Law Offices of Musi, Merkins, Daubengerger & Clark, LLP believes that:

- (a) it does not hold or represent an interest adverse to the estate,
- (b) it is a "disinterested person" pursuant to 11 U.S.C. §101(14); and
- (c) its employment is in the best interest of the estate as more fully explained in the Declaration in Support of Debtor's Application to Employ Musi, Merkins, Daubengerger & Clark, LLP, attached hereto.

9. The Debtor accordingly requests that it be authorized to employ Musi, Merkins, Daubengerger & Clark, LLP to represent it effective the date of this Application with compensation to be such amount as this Court may allow upon application presented in accordance with the Bankruptcy Code.

WHEREFORE, your Applicant pray for the entry of an Order, substantially in the form attached hereto, and for such other relief deemed justified and equitable.

Respectfully Submitted,

**KINGDOM EMPOWERMENT INTERNATIONAL
MINISTRY D/B/A KINGDOM EMPOWERMENT
INTERNATIONAL MINISTRIES**

By: /s/ Margufta Bellevue
Margufta Bellevue
President and Chairwoman

Date: November 29, 2024